

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

IN ADMIRALTY  
CASE NO: 22-61542

IN THE MATTER OF CARIBSHIP LLC,  
AS OWNER AND SEACOR ISLAND LINES  
LLC AS OPERATOR/OWNER PRO HAC VICE OF THE  
M/V CARIBBEAN EXPRESS I PETITIONING  
FOR EXONERATION FROM OR LIMITATION  
OF LIABILITY

Petitioners,

v.

SEATREK CHARTERS Inc.

Claimants.

/

**RENEWED MOTION TO WITHDRAW AS COUNSEL**

Fertig & Gramling including its attorney, John H. Wilbur III, hereby files this motion to withdraw as counsel for Claimant SEATREK CHARTERS, INC. pursuant to Rule 11.1 (d)(3) of the Local rules for U.S. District Court of the Southern District of Florida and states as follows:

1. Irreconcilable differences regarding the litigation and proceeding on the client's behalf have arisen between Fertig & Gramling and Plaintiff.
2. Counsel has raised these differences with Plaintiff's representatives.
3. The relationship is irretrievably broken.
4. The current contact information for Plaintiff is:

SeaTrek Charters Inc  
151 North Beach Rd – C 8  
Dania Beach, FL 33004  
[captain@seatrekcharter.com](mailto:captain@seatrekcharter.com)

And

PO Box 460506  
Ft Lauderdale, Florida 33346

5. A copy of the initial motion had been served on Seatrek Charters Inc via email and this Renewed Motion is also being emailed and mailed to Seatrek Charters Inc in compliance with the Court's Order [DE 15].
6. The undersigned conferred with counsel for Defendants regarding the Motion to Withdraw who do not object.

Wherefore, Fertig & Gramling respectfully request this Court's entry of an Order allowing it to withdraw as counsel for Plaintiff and providing for such other and further relief as this Court deems appropriate.

Respectfully Submitted,

/s John H. Wilbur III  
John H. Wilbur III (1031177)  
FERTIG & GRAMLING  
200 Southeast 13<sup>th</sup> Street  
Fort Lauderdale, FL 3316  
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FX: (954) 763-5412  
[John.wilbur@fertig.com](mailto:John.wilbur@fertig.com)  
*Attorneys for Claimants*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by CM/ECF and email on September 23, 2021 on all counsel of record or pro se parties identified on the Service List below.

Respectfully Submitted,

/s John H. Wilbur III  
JOHN H. WILBUR III (1031177)

FERTIG & GRAMLING

**SERVICE LIST**

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*Via CM/ECF*

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*Via email and mail*

And

PO Box 460506  
Ft Lauderdale, Florida 33346  
*Via mail*